

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- against -

PARKER H. PETIT and
WILLIAM TAYLOR

Defendants.

No. 19 Cr. 850 (JSR)

PARKER H. PETIT'S AND WILLIAM TAYLOR'S PROPOSED VOIR DIRE

Defendants Parker H. Petit and William Taylor respectfully ask the Court, pursuant to Federal Rule of Criminal Procedure 24(a), to include the following in its questioning of prospective jurors, in addition to the questions typically asked by the Court. Pursuant to Federal Rule of Criminal Procedure 24(a)(2), Messrs. Petit and Taylor also ask the Court to permit the attorneys for the parties to submit further questions that the Court may ask if it considers them proper, and in all events to ask whether the juror is certain that the particular fact or circumstance at issue would not influence the juror to favor the government or the defense.

I. TRIAL ADMINISTRATION & COVID-19

1. I expect this trial to last up to six weeks. Is there any reason, including any reason related to the coronavirus pandemic, that would make serving as a juror for up to six weeks a genuine and undue hardship for you or your family?

2. The Court has done its utmost to ensure that the courtroom and courthouse are a safe environment despite the coronavirus pandemic. Even so, would serving as a juror during the pandemic prevent you from being a fair, impartial, and attentive juror?

II. QUESTIONS SPECIFIC TO THE CASE

3. This case will involve evidence and allegations concerning accounting matters.
- a. Do you have any formal education in accounting?
 - b. Do you have any work experience in accounting?
4. This case will involve evidence and allegations concerning two executives of a corporation that sells healthcare products.
- a. Have you ever been an officer or director of a corporation?
 - b. Have you ever worked in a sales role (other than a retail setting)?

- c. Have you ever worked in a healthcare business, such as a pharmaceutical or medical device company?
- 5. Have you have ever owned your own business?
- 6. This case involves charges of conspiracy to commit securities fraud.
 - a. Do you invest in the stock market?
 - b. Have you or anyone close to you ever experienced significant financial losses from investing in the stock market?

Dated: October 21, 2020

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